

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

ALLEN R. CHACHA,

DEBTOR.

ANDREW R. VARA,  
UNITED STATES TRUSTEE

PLAINTIFF,

v.

ALLEN R. CHACHA

DEFENDANT.

CHAPTER 7

BANKR. NO. 24-14219-PMM

ADVERSARY NO. 25-00163-PMM

**DECLARATION OF JOHN SCHANNE IN SUPPORT OF PLAINTIFF'S REQUEST  
FOR ENTRY OF DEFAULT AGAINST DEFENDANT,  
ALLEN R. CHACHA, FOR WANT OF ANSWER**

I, John Schanne, under penalty of perjury, declare as follows:

1. I am a lawyer admitted to practice in the state of Pennsylvania. I am counsel to Andrew R. Vara, the United States Trustee for Regions 3 and 9, which includes the Eastern District of Pennsylvania (the "U. S. Trustee" or "Plaintiff"). The U.S. Trustee maintains an office at 900 Market Street, Suite 320, Philadelphia, Pennsylvania 19107.
2. I have personal knowledge of the matters set forth herein. I submit this declaration (the "Declaration") in support of the request to enter default against the defendant, Allen R. Chacha (the "Defendant"), pursuant to Fed. R. Civ. P. 55, which is incorporated herein by Fed. R. Bankr. P. 7055.

3. On June 17, 2025, the United States Trustee timely filed his complaint against the Defendant. The Complaint seeks revocation of the Defendant's discharge pursuant to 11 U.S.C. § 727(a)(2),(3),(4), and (5).
4. The Summons was issued to the Plaintiff for service upon the Defendant on June 18, 2025. A true and correct copy of the Summons is attached hereto as Exhibit A.
5. The Defendant was served with a copy of the Summons and Complaint on June 18, 2025. A true and correct copy of the Certificate of Service is attached hereto as Exhibit B.
6. It is respectfully requested that the Clerk enter default against the Defendant.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

By: /s/ John Schanne  
John Schanne  
Trial Attorney  
Office of the U. S. Trustee  
900 Market Street, Suite 320  
Philadelphia, Pennsylvania 19107  
(215) 597-4411  
(215) 597-5795 (fax)

DATED this 24th day of July 2025.